

Memorandum



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DATE : June 7, 1982
TO : Marsha Murry
FROM : Katherine Fletcher(Sgd.) Katherine Fletcher
SUBJECT : DPP on PCB's

Thank you for the opportunity to review the draft of the DPP on PCB's. Our initial comments on the draft are general, because we would like to raise the question of whether or not this is the best time or means to address the issues of PCB management which are currently being worked upon by different divisions within the utility. Rather than refine the procedures on PCB Spills and Food and Feed Facility Inspections, we would suggest the following:

1. Instead of documenting operating procedures in the language of EPA rules, is it not more important to establish operating procedures in the different divisions where they will be used? If so, should this not go into the form of one or more Departmental Operating Instructions, and not a DPP?
2. It has been established that City Light has relatively little need to allocate time and staff to the inspection of food and feed facilities, because we are involved with so few of them. While food and feed facilities are important and while PCB spill procedures are necessary, we would suggest rather that PCB disposal and storage and field inspection of capacities should receive greater attention in terms of procedures. Larry Tuffs is currently working on waste storage and disposal procedures for the South Service Center.
3. The final rulemaking on the currently proposed PCB rules will occur in August. While much of what you have written will probably not be changed, we suggest that we wait the six weeks until the rules are confirmed, rather than having to change them.

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4. The last few weeks have seen a lot of renewed activity in the utility concerning PCB management and procedures. Decisions concerning bookkeeping, disposal, and storage procedures and policies are being made or need to be made. Coordination needs to be established. The Superintendent and the Deputy Superintendent for Engineering and Utility Systems will probably want to review the results of this activity. We also suggest that any DPP is postponed until the conclusion of these activities.
5. We agree that it would be appropriate to outline Division responsibilities in a DPP. OEA is officially responsible for compliance and we would like to participate in drafting what our responsibilities entail. While we do not take issue with the general nature of the description of responsibilities as outlined in the draft, we note that the division of responsibilities begs the question of overall responsibility and coordination of PCB management. For example, how is it determined or communicated that a given number of PCB capacitors will be coming out of the system in a given year, which will in turn govern the amount of storage space and staff time required in the yard, which will in turn require a variable schedule and budget for disposal for the next 10 years or so?

If you have any questions or comments, please contact Claire Dyckman at 3568.

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